

90721

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

R. Keith Kelly, Circuit Court Judge

Appellate Case No. 2019-001145 / Lower Case No. 2017-CP-40-00517

Jackie Eadon Chalfant,
Individually and as Personal
Representative of the Estate of
Michael Dallas Chalfant,

Appellant,

v.

Carolinas Dermatology
Group, P.A., a South Carolina
Professional Association, and
Mark G. Blaskis, M.D.,
Individually.

Respondent.

RECEIVED

AUG 30 2019

SC Court of Appeals

APPELLANT'S MOTION TO REINSTATE

Appellant, Jackie Eadon Chalfant, Individually, and as Personal Representative of the Estate of Michael Dallas Chalfant, by and through the undersigned counsel, and pursuant to Rule 221, SCACR, hereby files this Motion to Reinstate the appeal dismissed on August 12, 2019, for failure to order the transcript pursuant to Rule 207, SCACR, and support thereof, states as follows:

STATEMENT OF FACTS

On June 7, 2019, the Appellant Jackie Eadon Chalfant, Individually, and as Personal Representative of the Estate of Michael Dallas Chalfant (hereinafter "Appellant") received written notice of entry of the Directed Verdict Orders/Judgments of the Honorable R. Keith Kelly as to Defendant, Mark G. Blaskis, M.D. On June 21, 2019, the Appellant received written

notice of entry of the Directed Verdict as to Defendant, Carolinas Dermatology Group, P.A. On July 8, 2019, the Appellant filed its Notice of Appeal as to the Directed Verdict Orders/Judgments.

On July 9, 2019, pursuant to Rule 207 SCACR, counsel for the Appellant, Michael G. Fink, Esq., requested and ordered the transcript of the entire transcript of the trial proceedings from the Court Reporter, Bonnie R. Kelly.

On July 26, 2019, the Appellants received a correspondence from the South Carolina Court of Appeals requesting a letter showing that the Appellant timely ordered the transcript from the court reporter and the status of the transcript within ten (10) days, or the appeal will be dismissed. A true and accurate copy of the July 26th correspondence is attached hereto and incorporated herein as **Exhibit "A"**.

On July 29, 2019, the undersigned submitted via U.S. Mail a correspondence to Bonnie Kelly, CVR, confirming that the entire transcript of the trial proceedings was ordered. Opposing counsel and the South Carolina Court of Appeals were copied on the correspondence, pursuant to Rule 207, SCACR. Unbeknownst to the undersigned, the correspondence was never received by the Court. A true and accurate copy of the July 29th correspondence is attached hereto and incorporated herein as **Exhibit "B"**.

On July 30, 2019, the undersigned submitted via U.S. Mail for filing Appellant's Notice of Filing and Compliance with Rule 207, SCACR and with the Clerk's letter directives dated July 26, 2019 providing copies of all communications/correspondence with the court reporter, Bonnie R. Kelly, regarding the ordering of the entire transcript of the trial proceedings on July 9, 2019. As an aside, the Appellant also submitted Appellant's Notice of Filing Lower Court Order Granting Plaintiff's Motion for Appearance Pro Hac Vice of Michael G. Fink, A Florida

Attorney. Unbeknownst to the undersigned, neither filing was received by the Court. A true and accurate copy of the July 30th filings submitted to the Court is attached hereto and incorporated herein as **Composite Exhibit “C”**.

On August 12, 2019, the Court entered its Order dismissing Appellant’s appeal for failure to order the transcript as required by Rule 207 SCACR and the Court’s letter dated July 26, 2019.

On August 14, 2019, the undersigned submitted a correspondence to the Court responding to the recent dismissal of the appeal, advising the Court that the transcript was ordered and that all copies of the correspondences were submitted to the Court pursuant to the Court’s July 26th correspondence. The Court received the aforementioned correspondence. A true and accurate copy of the August 14th correspondence is attached hereto and incorporated herein as **Exhibit “D”**.

On August 19, 2019, the Court delivered a correspondence in response, advising the undersigned that he must submit a Motion to Reinstate in compliance with Rules 221 and 240, SCACR, including proof of service on opposing counsel and payment of the filing fee. The Court directed the undersigned to deliver a corrected motion within fifteen (15) days, or remittitur will be entered. A true and accurate copy of the August 14th correspondence is attached hereto and incorporated herein as **Exhibit “E”**.

MEMORANDUM IN SUPPORT

Pursuant to Rule 207(1) SCACR, “Where a transcript of the proceeding must be prepared by the court reporter, appellant shall, within the time provided for ordering the transcript, make satisfactory arrangements (including agreement regarding payment for the transcript), in writing with the court report for furnishing the transcript...the transcript must be ordered within ten (10)

days after the date of service of the notice of appeal.”

On July 8, 2019, the Appellant filed its Notice of Appeal. It is clear from the communications between the Court Reporter and the Appellant’s counsels, that the transcript of the trial proceedings were ordered the following day.

Immediately upon receiving notice from the Court pursuant to its July 26th correspondence, the Appellant submitted via U.S. Mail a correspondence to Bonnie Kelly, CVR, confirming that the entire transcript of the trial proceedings was ordered, copying both opposing counsel and the South Carolina Court of Appeals on the correspondence. Unbeknownst to the undersigned, the correspondence was never received by the Court. On July 30th, the undersigned submitted via U.S. Mail for filing Appellant’s Notice of Filing and Compliance with Rule 207, SCACR and with the Clerk’s letter directives dated July 26, 2019, providing copies of all communications/correspondence with the court reporter, Bonnie R. Kelly regarding the ordering of the entire transcript of the trial proceedings on July 9, 2019. Unbeknownst to the undersigned, this correspondence was also never received by the Court.

In the Court’s August 19th correspondence, the Court advised that the appeal was dismissed “for the failure to order the transcript pursuant to Rule 207, SCACR, and for failure to respond to [the Court]’s July 26, 2019 letter”. The Appellants would ask the Court to consider the above-referenced timeline of events and exhibits in support of Appellants Motion to Reinstate its Appeal, as the Court was not in possession of the requested documents and communications due to a clerical oversight and apparent failure in the means of delivery, not through the intentional actions and/or perceived inactions of Appellant’s counsel. The Appellant did order the transcript within the required time period, and the Appellant did send multiple correspondences and filings to the Court in response to the July 26th correspondence and

directive. Notwithstanding, the undersigned and his co-counsels will take all precautionary steps to ensure proper delivery of all pleadings, filings, and correspondences hereinafter, should the relief requested herein be granted.

CONCLUSION

Based upon the foregoing, the Appellant requests that the Court enter an Order granting Appellant's Motion to Reinstate this Appeal, and for such other and further relief as the court deems just and proper.

August 29, 2019



William Thomas Geddings, Jr., Esq.
GEDDINGS LAW FIRM, P.A.
20 Brooks Street
Manning, SC 29102
Phone: (803) 435-4770
E-mail: wgeddings@geddingslawfirm.com
Attorney for Appellant

Other Counsel of Record:
Martin S. Driggers, Jr., Esq.
SWEENEY, WINGATE & BARROW, P.A.
115 Cargill Way, Suite B
Hartsville, South Carolina 29550
Phone: (843) 878-0390
E-mail: MSD@swblaw.com
Attorney for Respondent

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

R. Keith Kelly, Circuit Court Judge

Appellate Case No. 2019-001145 / Lower Case No. 2017-CP-40-00517

Jackie Eadon Chalfant,
Individually and as Personal
Representative of the Estate of
Michael Dallas Chalfant,

Appellant,

RECEIVED

AUG 30 2019

v.

Carolinas Dermatology
Group, P.A., a South Carolina
Professional Association, and
Mark G. Blaskis, M.D.,
Individually.

Respondent

SC Court of Appeals

PROOF OF SERVICE

I certify that I have served the Appellant's Notice of Filing of Lower Court's Order Granting Plaintiff's Motion to Reinstate, by depositing a copy of it in the United States Mail, postage prepaid, on August 29, 2019, addressed to his attorney of record, Martin S. Driggers, Jr., Esq., SWEENEY, WINGATE & BARROW, P.A., 115 Cargill Way, Suite B, Hartsville, South Carolina 29550 and by electronic mail to Martin S. Driggers, Esq., at MSD@swblaw.com on August 29, 2019.

August 29, 2019



William Thomas Geddings, Jr., Esq.
GEDDINGS LAW FIRM, P.A.
20 Brooks Street
Manning, SC 29102
Phone: (803) 435-4770
E-mail: wgeddings@geddingslawfirm.com
Attorney for Appellant



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1220 SENATE STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1890
FAX: (803) 734-1839
www.sccourts.org

July 26, 2019

Mr. William T. Geddings, Jr., Esquire
20 S Brooks St
Manning SC 29102

Re: Jackie Chalfant v. Carolinas Dermatology Group, PA
Appellate Case No. 2019-001145

Dear Counsel:

Our records reflect that the time for ordering the transcript has expired. Within ten days of the date of this letter, you must file a copy of the letter showing that you have timely ordered the transcript from the court reporter. If you have not timely ordered the transcript, you must serve and file a motion requesting permission to order the transcript outside of the filing deadlines set by Rule 207 of the SCACR, along with a copy of your letter addressed to the court reporter.

Be sure to copy the Court, the Office of Court Administration and opposing counsel with all correspondence concerning the transcript. The address for Court Administration is as follows:

South Carolina Office of Court Administration
1220 Senate Street, Suite 201
Columbia, SC 29201

Please advise the Court of the status of the transcript within ten (10) days of the date of this letter, or your appeal will be dismissed.

Very truly yours,

V. Claire Allen, Deputy

CLERK

cc: Martin S. Driggers, Jr., Esquire

Geddings Law Firm, PA

20 South Brooks Street
Manning, South Carolina 29102

W. T. Geddings, Jr.*

* also admitted to practice in Georgia

(803) 435-4770
FAX: (803) 435-2841
E-Mail: WTG@GeddingsLawFirm.com
FED ID # 57-1117536

July 29, 2019

Bonnie Kelly, CVR
P.O Box 50614
Columbia, South Carolina 29250

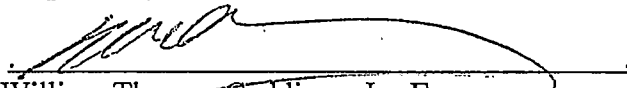
Re: Jackie Eadon Chalfant, Individually, and as Personal Representative of the Estate of Michael Dallas Chalfant v. Carolinas Dermatology Group, P.A. & Mark G. Blaskis, M.D.
Lower Court Case number: 2017-CP-40-00517
Appellate Case Number: 2019-001145

Dear Ms. Kelly:

This will confirm we have ordered the entire transcript of the trial proceedings in the above matter which tried before the Honorable R. Keith Kelly during the week of June 3, 2019. We have forwarded to you under separate cover from Pro Hoc Vice, Michael G. Fink, Esq. enclosed herein his firm's check in the amount of \$3,291.25 as payment in full per your request.

Should you have any questions or need any further information, please do not hesitate to contact me. Thank you for your assistance in this matter.

Respectfully,



William Thomas Geddings, Jr., Esq.
GEDDINGS LAW FIRM, P.A.
20 Brooks Street
Manning, SC 29102
Phone: (803) 435-4770
E-mail: wgeddings@geddingslawfirm.com
Attorney for Appellant

cc: Martin S. Driggers, Jr., Esq.
SWEENY, WINGATE & BARROW, P.A.
115 Cargill Way, Suite B
Hartsville, South Carolina 29550
Phone: (843) 878-0390
E-mail: MSD@swblaw.com
Attorney for Respondent

Michael G. Fink, Esq.
MIKE FINK LAW FIRM, P.A.
1500 Royal Palm Square Boulevard, Unit 101
Fort Myers, Florida 33919
Phone: (239) 939-1906
E-mail: Mfink@MikeFinkLaw.net
Pro Hac Vice Attorney for Appellant

South Carolina Office of Court Administration
1220 Senate Street, Suite 201
Columbia, SC 29201

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Geddings Law Firm, PA

20 South Brooks Street
Manning, South Carolina 29102

COMPOSITE EXHIBIT "C"

W. T. Geddings, Jr.*

* also admitted to practice in Georgia

(803) 435-4770

FAX: (803) 435-2841

E-Mail: WTG@GeddingsLawFirm.com

FED ID # 57-1117536

July 30, 2019

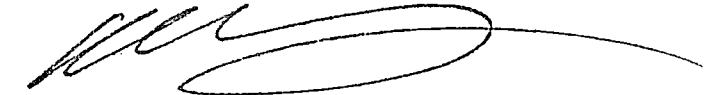
South Carolina Office of Court Administration
120 Senate Street, Suite 201
Columbia, South Carolina 29201

RE: Jackie Eadon Chalfant, Individually and as Personal Representative of the Estate of Michael Dallas Chalfant, Appellant, v. Carolinas Dermatology Group, P.A., a South Carolina Professional Association, and Mark G. Blaskis, M.D., Individually, Respondent, Appellate Case No. 2019-001145 / Lower Case No. 2017-CP-40-00517

Dear Sir or Madam:

Enclosed please find a true and correct copy of the Appellant's Notice of Filing and Compliance with Rule 207, SCACR and with the Clerk's letter directives dated July 26, 2019 providing copies of all communications/correspondence with the court reporter, Bonnie R. Kelly regarding the ordering of the entire transcript of the trial proceedings on July 9, 2019.

Sincerely,



William Thomas Geddings, Jr., Esq.

GEDDINGS LAW FIRM, P.A.

20 Brooks Street

Manning, SC 29102

Phone: (803) 435-4770

E-mail: wgeddings@geddingslawfirm.com

Attorney for Appellant

cc: Martin S. Driggers, Jr., Esq.
SWEENEY, WINGATE & BARROW, P.A.
115 Cargill Way, Suite B
Hartsville, South Carolina 29550
Phone: (843) 878-0390
E-mail: MSD@swblaw.com
Attorney for Respondent

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
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R. Keith Kelly, Circuit Court Judge

Appellate Case No. 2019-001145 / Lower Case No. 2017-CP-40-00517

Jackie Eadon Chalfant,
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v.


Carolinas Dermatology
Group, P.A., a South Carolina
Professional Association, and
Mark G. Blaskis, M.D.,
Individually.

Respondent.

APPELLANT'S NOTICE OF FILING AND COMPLIANCE WITH
RULE 207, SCACR

Appellant, Jackie Eadon Chalfant, Individually, and as Personal Representative of the Estate of Michael Dallas Chalfant, hereby gives Notice of Filing and Compliance with Rule 207, SCACR and Clerk's Letter directives dated July 26, 2019 and hereby files all copies of all communications/correspondence with the court reporter, Bonnie R. Kelly, CVR, regarding ordering of the entire transcript of trial proceedings on July 9, 2019.

July 30, 2019


William Thomas Geddings, Jr., Esq.
GEDDINGS LAW FIRM, P.A.

20-Brooks Street

Manning, SC 29102

Phone: (803) 435-4770

E-mail: wgeddings@geddingslawfirm.com

Attorney for Appellant

Other Counsel of Record:

Martin S. Driggers, Jr., Esq.

SWEENY, WINGATE & BARROW, P.A.

115 Cargill Way, Suite B

Hartsville, South Carolina 29550

Phone: (843) 878-0390

E-mail: MSD@swblaw.com

Attorney for Respondent

Subject: Re: Chalfant v. Carolinas Dermatology Group - Transcript from Proceedings
Date: Monday, July 29, 2019 at 12:25:11 PM Eastern Daylight Time
From: Kelly, Bonnie <bkelly@sccourts.org>
To: Mike Fink <mfink@mikefinklawnet>
Attachments: image001.png

Sounds good. Thanks!

Bonnie H. Kelly, CVR
Official Court Reporter
5th Circuit - At-large

From: Mike Fink <mfink@mikefinklawnet>
Sent: Monday, July 29, 2019 12:23:17 PM
To: Kelly, Bonnie
Subject: Re: Chalfant v. Carolinas Dermatology Group - Transcript from Proceedings

*** EXTERNAL EMAIL: This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

Bonnie:

I'm mailing the attached check today for our request for the entire trial transcript.

Let me know if you need anything from our end. Because it is late, we are required to file a Motion For Permission to Order Transcript Outside of the Filing Deadlines along with our letter transmitting payment. Please hold the funds and don't start preparing the transcript wait until we get appellate court approval to order the transcript late. I assume it will be no problem.

Respectfully,

Michael G. Fink, Esq.
MIKE FINK LAW FIRM
Florida Bar Number: 0825743
1500 Royal Palm Square Blvd., Unit 101
Fort Myers, Florida 33919
Phone: (239) 939-1906<tel:%28239%29%20939-1906>
Cell: (239) 826-9010
Email: MFink@MikeFinkLaw.net<mailto:MFink@MikeFinkLaw.net>

[id:image001.png@01D256C0.200B5990]

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From: "Kelly, Bonnie" <bkelly@sccourts.org>
Date: Monday, July 29, 2019 at 10:45 AM
To: Michael Fink <mfink@mikefinklaw.net>
Subject: Re: Chalfant v. Carolinas Dermatology Group - Transcript from Proceedings

Hey, I can't use an Amex card, but I do accept PayPal payments You can go to PayPal and type in my user name, bonniekelly21@gmail.com<<mailto:bonniekelly21@gmail.com>> Then select FRIENDS AND FAMILY so there's no fee, and payment is sent to me immediately. If you'd rather pay by check, that's fine, too PO BOX 50614 Columbia, SC 29250

That is TERRIBLE about your associate I hope he is improving daily.

Bonnie H. Kelly, CVR
Official Court Reporter
5th Circuit - At-large

From: Mike Fink <mfink@mikefinklaw.net<<mailto:mfink@mikefinklaw.net>>>
Sent: Monday, July 29, 2019 7:37:03 AM
To: Kelly, Bonnie
Subject: Re: Chalfant v. Carolinas Dermatology Group - Transcript from Proceedings

*** EXTERNAL EMAIL: This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***
Bonnie:

I apologize, I thought we had paid this. My associate Andrew who appeared at trial sustained a head injury and has been unable to work.

Can you use my AmEx card? ~~245-4666-1~~ 2004, exp 7/22, code ~~5~~

If not, please let me know and we will get a check out today.

Respectfully,

Michael G. Fink, Esq.
MIKE FINK LAW FIRM
Florida Bar Number: 0825743
1500 Royal Palm Square Blvd., Unit 101
Fort Myers, Florida 33919
Phone: (239) 939-1906<<tel:%28239%29%20939-1906>>
Cell: (239) 826-9010
Email: MFink@MikeFinkLaw.net<<mailto:MFink@MikeFinkLaw.net>><<mailto:MFink@MikeFinkLaw.net>>

[id:image001.png@01D256C0.200B5990<<mailto:image001.png@01D256C0.200B5990>>]

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transaction or matter addressed in this e-mail or attachment.

From: "Kelly, Bonnie" <bkelly@sccourts.org<<mailto:bkelly@sccourts.org>>>
Date: Wednesday, July 17, 2019 at 3:11 PM
To: Michael Fink <mfink@mikefinklaw.net<<mailto:mfink@mikefinklaw.net>>>
Subject: RE: Chalfant v. Carolinas Dermatology Group - Transcript from Proceedings

Hey, Mike. I haven't yet received payment for the transcript and as I indicated in my email, advance payment is required prior to transfer production. I was wondering if you might check on the status of payment. Thanks so much!
Bonnie H. Kelly, CVR
Official Court Reporter
5th Circuit - At-large

From: Mike Fink [mfink@mikefinklaw.net<<mailto:mfink@mikefinklaw.net>><<mailto:mfink@mikefinklaw.net>>
<<mailto:mfink@mikefinklaw.net%3e>>]
Sent: Tuesday, July 9, 2019 10:26 AM
To: Kelly, Bonnie
Subject: Re: Chalfant v. Carolinas Dermatology Group - Transcript from Proceedings

*** EXTERNAL EMAIL: This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***
Hi Bonnie:

We filed the Notice of Appeal yesterday. So, the entire transcript is required.

Respectfully,

Michael G. Fink, Esq.
MIKE FINK LAW FIRM
Florida Bar Number: 0825743
1500 Royal Palm Square Blvd., Unit 101
Fort Myers, Florida 33919
Phone: (239) 939-1906<<tel:%28239%29%20939-1906>>
Cell: (239) 826-9010
Email: MFink@MikeFinkLaw.net<<mailto:MFink@MikeFinkLaw.net>><<mailto:MFink@MikeFinkLaw.net>>
<<mailto:MFink@MikeFinkLaw.net%3e>><<mailto:MFink@MikeFinkLaw.net>>>

ORDERED

[id:image001.png@01D256C0.200B5990<<mailto:image001.png@01D256C0.200B5990>>
<<mailto:image001.png@01D256C0.200B5990%3e>>]

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From: "Kelly, Bonnie" <bkelly@sccourts.org<<mailto:bkelly@sccourts.org>><<mailto:bkelly@sccourts.org>>
<<mailto:bkelly@sccourts.org%3e>>>

Date: Monday, July 8, 2019 at 9:30 PM
To: Andrew Walker <awalker@mikefinklaw.net<<mailto:awalker@mikefinklaw.net>>
<<mailto:awalker@mikefinklaw.net>><<mailto:awalker@mikefinklaw.net%3e>>>
Subject: Re: Chalfant v. Carolinas Dermatology Group - Transcript from Proceedings

I have not heard from you regarding production of the excerpts of this trial and was wondering if you have decided not to proceed. Thanks.

Bonnie H. Kelly, CVR
Official Court Reporter
5th Circuit - At-large

→ Exhibit "A" Court Rptr 6/13/19 8:55:04 PM EMAIL Goes here ←

From: Andrew Walker <awalker@mikefinklaw.net<<mailto:awalker@mikefinklaw.net>>
<<mailto:awalker@mikefinklaw.net>><<mailto:awalker@mikefinklaw.net>><<mailto:awalker@mikefinklaw.net%3e>>
<<mailto:awalker@mikefinklaw.net%3e%3cmailto:awalker@mikefinklaw.net%3e%3cmailto:awalker@mikefinklaw.net%3e%3e>>>>
Sent: Thursday, June 13, 2019 11:26 AM
To: Kelly, Bonnie
Subject: RE: Chalfant v. Carolinas Dermatology Group - Transcript from Proceedings

*** EXTERNAL EMAIL: This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

Perfect. For now we are requesting estimates for:

Dr. Mark Blaskis (all testimony)
Dr. Sean Christensen (all testimony)
The Motions and rulings from June 6, 2019

Can we also get an estimate for the entire transcript so we are aware, as we will need that eventually.

Respectfully,

Andrew Walker, Esq.

MIKE FINK LAW FIRM, P. A.
1500 Royal Palm Square Blvd., Unit 101
Fort Myers, Florida 33919
E-Mail: AWalker@MikeFinkLaw.net<<mailto:AWalker@MikeFinkLaw.net>><<mailto:AWalker@MikeFinkLaw.net>>
<<mailto:AWalker@MikeFinkLaw.net>><<mailto:AWalker@MikeFinkLaw.net%3e%3cmailto:AWalker@MikeFinkLaw.net%3e%3cmailto:AWalker@MikeFinkLaw.net%3e%3e>>>>
Service E-Mail: Eservice@MikeFinkLaw.net<<mailto:Eservice@MikeFinkLaw.net>>
<<mailto:Eservice@MikeFinkLaw.net>><<mailto:Eservice@MikeFinkLaw.net%3e%3cmailto:Eservice@MikeFinkLaw.net%3e%3cmailto:Eservice@MikeFinkLaw.net%3e%3e>>>>
Phone: (239) 939-1906
Fax: (239) 939-1915

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-----Original Message-----

From: Kelly, Bonnie [mailto:bkelly@sccourts.org]

Sent: Thursday, June 13, 2019 11:13 AM

To: Andrew Walker

Subject: Re: Chalfant v. Carolinas Dermatology Group - Transcript from Proceedings

Good morning! (803) 261-2020 is my cell. Just so you know, I'm not allowed to carve out portions at random. It has to be all direct or all cross of a witness or both; all opening/closing of one attorney or both, etc. Hope that makes sense. Best time to call would be after hours or on the weekend.

You can just tell me which portions you need and I will send you estimates as requested. Thank you!

Bonnie H. Kelly, CVR
Official Court Reporter
5th Circuit - At-large

From: Andrew Walker <awalker@mikefinklaw.net<mailto:awalker@mikefinklaw.net>
<mailto:awalker@mikefinklaw.net><mailto:awalker@mikefinklaw.net><mailto:awalker@mikefinklaw.net%3e>
<mailto:awalker@mikefinklaw.net%3e%3cmailto:awalker@mikefinklaw.net%3e%3cmailto:awalker@mikefinklaw.net%3e%3e>>

Sent: Thursday, June 13, 2019 10:39 AM

To: Kelly, Bonnie

Cc: Tommy Geddings

Subject: Chalfant v. Carolinas Dermatology Group - Transcript from Proceedings

*** EXTERNAL EMAIL: This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. *** Good Morning Ms. Kelly,

It was a pleasure getting to know you last week and thank you for all your hard work.

If you could please provide me with the best number to reach you, I would like to discuss the process of ordering portions of the trial transcript from you.

Please let me know what works best for your schedule.

Respectfully,

Andrew Walker, Esq.

MIKE FINK LAW FIRM, P. A.

1500 Royal Palm Square Blvd., Unit 101

Fort Myers, Florida 33919

E-Mail: AWalker@MikeFinkLaw.net<mailto:AWalker@MikeFinkLaw.net><mailto:AWalker@MikeFinkLaw.net>
<mailto:AWalker@MikeFinkLaw.net>

<mailto:AWalker@MikeFinkLaw.net<mailto:AWalker@MikeFinkLaw.net%3e%3cmailto:AWalker@MikeFinkLaw.net%3e%3e>>

<mailto:AWalker@MikeFinkLaw.net%3e%3cmailto:AWalker@MikeFinkLaw.net%3e%3cmailto:AWalker@MikeFinkLaw.net%3e%3e>>

Service E-Mail: Eservice@MikeFinkLaw.net<mailto:Eservice@MikeFinkLaw.net>

<mailto:Eservice@MikeFinkLaw.net><mailto:Eservice@MikeFinkLaw.net>

<mailto:Eservice@MikeFinkLaw.net>
<mailto:Eservice@MikeFinkLaw.net>
<mailto:Eservice@MikeFinkLaw.net>
<mailto:Eservice@MikeFinkLaw.net>
<mailto:Eservice@MikeFinkLaw.net>
Phone: (239) 939-1906
Fax: (239) 939-1915

[Logo Pic]

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**Subject:** Estimated costs to produce excerpts from Chalfant trial  
**Date:** Thursday, June 13, 2019 at 8:55:04 PM Eastern Daylight Time  
**From:** Bonnie Kelly <bonniekelly21@gmail.com>  
**To:** Andrew Walker <awalker@mikefinklaw.net>

6/13/19  
8:55 PM  
EMAIL

Good evening, Mr. Walker. The following are estimates to produce the requested portions of the trial transcript as requested:

|                     | Normal Production | Expedited Production |
|---------------------|-------------------|----------------------|
| Dr. Blaskis         | \$306.00          | 360.00               |
| Dr. Christensen     | \$318.75          | 375.00               |
| Motions from 6/6/19 | \$306.00          | 360.00               |
| Transcript in toto  | \$3,291.25        | N/A                  |

I did not include the proffered testimony of Dr. Blaskis that was done on 6/6/19, nor did I include the motion to allow him to be recalled just prior to that proffer. That would increase the motions amount to approximately \$360/410 if you need that as well.

The estimated amounts do not include postage. That will be in the neighborhood of \$20, I suspect. E-tran is \$40, but it's quicker and we don't have to involve USPS (not always the most reliable peeps in my experience unfortunately.)

Advanced payment is required prior transcript production, and according to our rules, I have 60 days from date of receipt of payment in which to produce the transcript.

I could produce the smaller sections on an expedited basis (seven [7] business days from date of receipt of payment) but I could not produce the entire transcript in 7 days because of my time in court, travel, etc.

My mailing address is PO BOX 50614, Columbia, SC 29250. Please advise as to how you'd like to proceed. Thank you for allowing me to be of service.

Bonnie Kelly, CVR  
PO Box 50614  
Columbia, SC 29250

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

R. Keith Kelly, Circuit Court Judge

Appellate Case No. 2019-001145 / Lower Case No. 2017-CP-40-00517

Jackie Eadon Chalfant,  
Individually and as Personal  
Representative of the Estate of  
Michael Dallas Chalfant,

Appellant,

v.

Carolinas Dermatology  
Group, P.A., a South Carolina  
Professional Association, and  
Mark G. Blaskis, M.D.,  
Individually.

Respondent.

**APPELLANT'S NOTICE OF FILING LOWER COURT ORDER  
GRANTING PLAINTIFF'S MOTION FOR APPEARANCE PRO HAC  
VICE OF MICHAEL G. FINK, A FLORIDA ATTORNEY**

Appellant, Jackie Eadon Chalfant, Individually, and as Personal Representative of the Estate of Michael Dallas Chalfant, hereby gives Notice of Filing of Lower Court Order Granting Plaintiff's Motion for Appearance Pro Hac Vice of Michael G. Fink, a Florida Attorney Who is Not a South Carolina Resident dated January 5, 2018.

July 30, 2019

  
William Thomas Geddings, Jr., Esq.  
GEDDINGS LAW FIRM, P.A.

20 Brooks Street  
Manning, SC 29102

Phone: (803) 435-4770

E-mail: [wgeddings@geddingslawfirm.com](mailto:wgeddings@geddingslawfirm.com)

Attorney for Appellant

Other Counsel of Record:  
Martin S. Driggers, Jr., Esq.  
SWEENY, WINGATE & BARROW, P.A.  
115 Cargill Way, Suite B  
Hartsville, South Carolina 29550

Phone: (843) 878-0390

E-mail: [MSD@swblaw.com](mailto:MSD@swblaw.com)

Attorney for Respondent

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

R. Keith Kelly, Circuit Court Judge

---

Appellate Case No. 2019-001145 / Lower Case No. 2017-CP-40-00517

---

Jackie Eadon Chalfant,  
Individually and as Personal  
Representative of the Estate of  
Michael Dallas Chalfant,

Appellant,

v.

Carolinas Dermatology  
Group, P.A., a South Carolina  
Professional Association, and  
Mark G. Blaskis, M.D.,  
Individually.

Respondent.

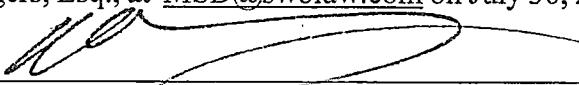
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**PROOF OF SERVICE**

---

I certify that I have served the Appellant's Notice of Filing of Lower Court's Order Granting Plaintiff's Motion For Appearance Pro Hac Vice of Michael G. Fink, a Florida Attorney dated January 5, 2018 on Carolinas Dermatology Group, P.A., a South Carolina Professional Association, and Mark G. Blaskis, M.D., Individually, by depositing a copy of it in the United States Mail, postage prepaid, on July 30, 2019, addressed to his attorney of record, Martin S. Driggers, Jr., Esq., SWEENY, WINGATE & BARROW, P.A., 115 Cargill Way, Suite B, Hartsville, South Carolina 29550 and by electronic mail to Martin S. Driggers, Esq., at [MSD@swblaw.com](mailto:MSD@swblaw.com) on July 30, 2019.

July 30, 2019

  
\_\_\_\_\_  
William Thomas Geddings, Jr., Esq.  
GEDDINGS LAW FIRM, P.A.  
20 Brooks Street  
Manning, SC 29102  
Phone: (803) 435-4770  
E-mail: [wgeddings@geddingslawfirm.com](mailto:wgeddings@geddingslawfirm.com)  
Attorney for Appellant

STATE OF SOUTH CAROLINA, )  
 )  
 COUNTY OF RICHLAND )  
 )  
 Jackie Eadon Chalfant, Individually, and )  
 as Personal Representative of the Estate of )  
 Michael Dallas Chalfant. Deceased, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 Carolinas Dermatology Group, P. A., a )  
 South Carolina Professional Association, )  
 and Mark G. Blaskis, M. D., Individually, )  
 )  
 Defendants. )

IN THE COURT OF COMMON PLEAS

Case Number: 2017-CP-40-00017

FILED  
 JAN -5 AM 11:34  
 RICHLAND COUNTY

ORDER GRANTING  
 PLAINTIFF'S MOTION FOR  
 APPEARANCE PRO HAC VICE

THIS CAUSE coming to be heard on the Plaintiff's Motion For Appearance Pro Hac Vice permitting Michael G. Fink, Esquire, a Florida Attorney who is not a South Carolina resident, to appear and represent the Plaintiff in conjunction with local counsel, and the Court having reviewed the Plaintiff's Motion For Appearance Pro Hac Vice, the attached Application For Admission Pro Hac Vice and the case file in this matter, and, being otherwise duly advised in the premises, IT IS

ORDERED AND ADJUDGED as follows:

1. That Plaintiff's Motion For Appearance Pro Hac Vice by Michael G. Fink, Esquire, a Florida Attorney who is not a South Carolina resident is hereby GRANTED, and Michael G. Fink, Esquire is authorized to appear and represent the Plaintiff in this action in conjunction with local counsel, William Thomas Geddings, Jr. Esquire in accordance with Rule 404, South Carolina Court Rules.

Done and Ordered in Chambers in Columbia, Richland County, South Carolina this

2 day of Jan, 2017/2018.

*Robert Hood*  
 HONORABLE ALISON R. LEE  
 Chief Administrative Circuit Court Judge

cc:

*Attorneys for Plaintiff*

William Thomas Geddings, Jr., Esq.  
GEDDINGS LAW FIRM, P.A.

20 Brooks Street

Manning, SC 29102

Phone: (803) 435-4770

E-mail: [wgeddings@geddingslawfirm.com](mailto:wgeddings@geddingslawfirm.com)

Michael G. Fink, Esq.

MIKE FINK LAW FIRM, P.A.

2029 Bayside Parkway

Fort Myers, Florida 33901

Phone: (239) 939-1906

E-mail: [MFink@MikeFinkLaw.net](mailto:MFink@MikeFinkLaw.net)

*Attorney for Defendant*

William O. Sweeny, III, Esq.

SWEENY, WINGATE, & BARROW, PA

PO Box 12129

Columbia, SC 29211

VERIFIED APPLICATION FOR ADMISSION PRO HAC VICE  
IN THE STATE OF SOUTH CAROLINA

Jackie Eadon Chalfant, Individually, and  
as Personal Representative of the Estate of  
Michael Dallas Chalfant. Deceased,

2017-CP-40-00517

IN THE COURT OF  
COMMON PLEAS  
RICHLAND COUNTY

Plaintiff

Case No.

Court

vs.

Mailing Address of Court: \_\_\_\_\_

Carolinas Dermatology Group, P. A., a  
South Carolina Professional Association,  
and Mark G. Blaskis, M. D., Individually,

Defendant

Comes now Michael G. Fink, applicant herein, and respectfully represents the following:

1. Applicant resides at:

1332 Caloosa Vista Road

Street Address

Fort Myers

City

(239) 939-1906

Telephone

Lee

County

FL

State

33901

Zip Code

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of)

MIKE FINK LAW FIRM, P.A., with offices at, at

2029 Bayside Parkway

Street Address

Fort Myers

City

(239) 939-1906

Telephone

Lee

County

FL

State

(239) 939-1915

Fax Number

33901

Zip Code

2. Applicant has been retained personally or as a member of the above named law firm by  
Jackie Eadon Chalfant, Individually, and as Personal Representative of the Estate of Michael Dallas  
Chalfant, Deceased.

to provide legal representation in connection with the above case now pending before the above named court of the State  
of South Carolina.

4. Since October of 1989, applicant has been, and presently is, a member in good standing of the bar of the  
highest court of the District of Columbia or the State of Florida where applicant regularly practices law. Attached is a  
certificate of good standing.

5. Applicant has been admitted to practice before the following courts: (List all of the following courts  
applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the  
Supreme Court of the United States; and courts of other states or the District of Columbia.)

Court:

Date Admitted:

|                                                                      |            |
|----------------------------------------------------------------------|------------|
| United States District Court for the Middle District of<br>Florida   | 12/18/1989 |
| United States District Court for the Southern District of<br>Florida | 8/12/1994  |

|                                                         |           |
|---------------------------------------------------------|-----------|
| United States Court of Appeals for the Eleventh Circuit | 3/11/1994 |
| United States Court of Federal Claims                   | 9/29/1994 |

Applicant is presently a member in good standing of the bars of those courts listed above, except as listed below:  
(List any court named in the preceding paragraph that applicant is no longer admitted to practice before.)

United States Court of Appeals for the Eleventh Circuit

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court, date):

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation):

N/A

8. Applicant never has had any certificate or privilege to appear and practice before any administrative body suspended or revoked, except as provided below (give particulars, e.g., date, administrative body, date of suspension and reinstatement):

N/A

9. Local counsel of record associated with applicant in this case is William T. Geddings, Jr., of the Geddings law firm, which has offices at:

20 South Brooks Street

Street Address

Clarendon

County

(803) 435-4770

Telephone

Manning

City

South Carolina

State

29102

Zip Code

If applicable list all other firms/attorneys you are associated with in this matter

N/A

10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

2016-NI-40-00033- Case closed, Medical Malpractice case filed under 2017-CP-40-0517

Date of Application: May 25, 2016

Local Counsel: William T. Geddings, Jr.

11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

12. Applicant respectfully requests to be admitted to practice in the above named court for this case only.

DATED this 21st day of December, 2017.

  
APPLICANT

VERIFICATION

STATE OF FLORIDA)

COUNTY OF LEE)

I, MICHAEL G. FINK, do hereby swear or affirm under penalty of perjury that I am the applicant in the above styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true.

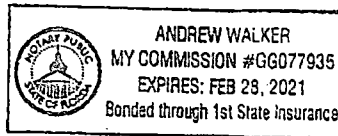
[Signature]  
APPLICANT/AFFILIANT

Subscribed and sworn to before me this 21<sup>st</sup> day of December, 2017.

[Signature]

Notary Public for the State of Florida

My Commission Expires: \_\_\_\_\_



LOCAL COUNSEL CONSENT

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 21 day of Dec, 2017.

[Signature]  
LOCAL COUNSEL OF RECORD

CERTIFICATE OF SERVICE

W.T. Geddings Jr  
SC Bar #11300

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by mail addressed to: South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this 21<sup>st</sup> day of DECEMBER, 2017.

[Signature]  
APPLICANT/AFFILIANT



# The Florida Bar

651 East Jefferson Street  
Tallahassee, FL 32399-2300

John F. Harkness, Jr.  
Executive Director

Joshua E. Doyle  
Executive Director Designate

State of Florida )

County of Leon )

In Re: 0825743

Michael Gordon Fink  
MIKE FINK LAW FIRM, P.A.  
MIKE FINK LAW Firm, P. A. 2029 Bayside Pkwy  
Fort Myers, FL 33901-3101

## I CERTIFY THE FOLLOWING:

I am the custodian of membership records of The Florida Bar.

Membership records of The Florida Bar indicate that The Florida Bar member listed above was admitted to practice law in the state of Florida on October 19, 1989.

The Florida Bar member above is an active member in good standing of The Florida Bar who is eligible to practice law in the state of Florida.

Dated this 21st day of December, 2017.

Pam Gerard, Manager  
Membership Records Dept.  
The Florida Bar



PG:R10  
CTM-00162

**MICHAEL G. FINK**

Mike Fink Law Firm, P.A. 2029  
Bayside Parkway  
Fort Myers, Florida 33901  
Phone: (239) 939-1906  
Fax: (239) 939-1915  
E-mail: [mfink@MikeFinkLaw.net](mailto:mfink@MikeFinkLaw.net)

**EDUCATION**

Miami Palmetto Senior High School, 1982  
Miami-Dade Community College, South Campus 1982-1983  
University of South Carolina, Columbia, SC 1986, B.S., Finance, *Cum Laude*  
University of South Carolina, Columbia, SC, School of Law, J.D. 1989.

**LEGAL EXPERIENCE**

Mike Fink Law Firm, P.A. a/k/a Mike Fink Trial Lawyers, P. A. Fort Myers, Florida  
Partner 2009 – present

- General Civil Litigation
- Commercial Litigation
- Personal Injury
- Employment Law
- Criminal Defense
- Family Law

Fink & Lane, P.A. f/k/a Fink & Boyle, P.A. f/k/a Fink, Boyle & Gentile, P.A. Ft. Myers, FL  
Managing Partner, 1994-2003 (Sold Practice)

- Outside General Counsel, First Home Builders (SWFL's Largest Builder) (1999 -2005)
- Outside General Counsel to the Lee County School Board (1994 – 1999)
- Representation of Both Plaintiff's and Defendants
- Insurance Defense – Major losses. Representative clients: Zurich (Maryland Casualty), USAA, Nationwide CMU, State Farm, Auto Owners.
- Personal Injury
- General Civil and Commercial Litigation
- Medical Malpractice Representing both Plaintiff's and Defendants
- Intellectual Property Disputes – Copyright Infringement
- Governmental Defense on behalf of Cities, Counties and School Boards, including Lee County School Board (10 years), Lee County Sheriff's Department (3 years), Lee County Emergency Medical Services (3 yrs), City of Punta Gorda, City of Cape Coral, Desoto County, Hendry County Sheriff's Dept., Charlotte County Government, etc.
- Employment Law
- Civil Rights Litigation

Fowler, White, Gillen, Boggs, Villareal & Banker, P.A. Fort Myers, Florida  
Associate, 1989-1994

- Insurance Defense Litigation on behalf of large insurance companies
- Governmental Liability/Immunity, including representation of members of SWFL Inter-Governmental Risk Management Association.
- Civil Litigation, Business and Commercial Litigation
- Outside Gen. Counsel to the Sheriff of Lee County, John McDougal (1992 – 1994)
- Outside Gen. Counsel to the Lee County School Board (1992 – 1994)
- Defense Attorney for Wal-Mart and Sam's Wholesale Club

### CERTIFICATIONS

- Florida Board Certified Civil Trial Lawyer (1991 – 2013)
- Florida Supreme Court Certified Circuit Court Mediator (2000 – Present)

### ADMITTED TO PRACTICE

- All Florida State Courts
- U.S. District Court for the Middle District of Florida (December 18, 1989)
- U.S. District Court for the Southern District of Florida (August 12, 1994)
- U.S. Court of Federal Claims (September 29, 1994)
- U.S. Circuit Court of Appeals for Eleventh Circuit (March 11, 1994)

### TEACHING POSITIONS

- Adjunct Professor of Civil Procedure, Edison Community College (1999 - 2000)
- Adjunct Professor of Torts, Florida Gulf Coast University (2013 – Present)

### SERVICE POSITIONS

- Florida Bar Grievance Committee, Vice Chair/Committee Member (2006 – 2009)
- Advisory Board Member, FGCU Department of Justice Studies (2014 – present)
- Moot Court Competition, Acting Trial Judge/Competition Judge Volunteer (2012 -2014)
- United Way Campaign Committee, Member (2003)
- Cancer Society Cattle Baron's Ball Committee Member (2004)

### SPEAKING ENGAGEMENTS

- The Briar Patch: Thorny Issues in Florida Litigation (June 2006)
- Trying the Automobile Injury Case in Florida (June 1994)
- Nationwide Insurance – Bad Faith Actions in Florida (June 1994)
- Speaker, Allstate Insurance Company, PIP Litigation (August 1991)

### HONORS AND AWARDS

- Selected as a "Go to Lawyer" "when winning is a must" by Gulfshore Life Magazine, (July 2007)
- Awarded the "Key to The City of Fort Myers" for his significant historic preservation efforts to save Fort Myers' oldest home, the "Towles Historic Home" (circa 1885) from demolition. The Towles Home is now established on the Register of National Historic Places and will be protected in perpetuity from demolition. (November 2007)
- Honorary Deputy Sheriff of Lee County, Florida (2000 – present)

### MEMBERSHIPS (PAST & CURRENT)

- Lee County Bar Association
- Florida Justice Association
- National Association of Criminal Defense Lawyers
- Caloosa Inns of Court
- Sigma Chi Fraternity Member, Former President, Social Chairman and House Manager

### PERSONAL

- Born: December 23, 1963
- Hometown: Manning, South Carolina
- Divorced with two children, Michael (16) and Sydney (14)
- Owner of First Home Title, Inc., America's largest title company (1999-2007)
- Licensed Private Pilot, Single Engine Land (July 1983 – Present)

EXHIBIT "B"

STATE OF SOUTH CAROLINA  
COUNTY OF RICHLAND  
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NUMBER: 2017CP4000517

Jackie Eadon Chalfant

Carolinas Dermatology Group P A

Michael Dallas Chalfant

South Carolina Professional Association

PLAINTIFF(S)

DEFENDANT(S)

|                     |                                                                                                                                            |
|---------------------|--------------------------------------------------------------------------------------------------------------------------------------------|
| Submitted by: _____ | Attorney for : <input type="checkbox"/> Plaintiff <input type="checkbox"/> Defendant or <input type="checkbox"/> Self-Represented Litigant |
|---------------------|--------------------------------------------------------------------------------------------------------------------------------------------|

**DISPOSITION TYPE (CHECK ONE)**

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ACTION DISMISSED (CHECK REASON):**  Rule 12(b), SCRPC;  Rule 41(a), SCRPC (Vol. Nonsuit);  
 Rule 43(k), SCRPC (Settled);  Other \_\_\_\_\_
- ACTION STRICKEN (CHECK REASON):**  Rule 40(j), SCRPC;  Bankruptcy;  
 Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;  Other \_\_\_\_\_
- STAYED DUE TO BANKRUPTCY**
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**  
 Affirmed;  Reversed;  Remanded;  Other \_\_\_\_\_

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED:  See attached order (formal order to follow)  Statement of Judgment by the Court:

**ORDER INFORMATION**

This order  ends  does not end the case. Additional Information for the Clerk : \_\_\_\_\_

**INFORMATION FOR THE JUDGMENT INDEX**

Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.

| Judgment in Favor of (List name(s) below) | Judgment Against (List name(s) below) | Judgment Amount To be Enrolled |
|-------------------------------------------|---------------------------------------|--------------------------------|
|                                           |                                       | \$                             |
|                                           |                                       | \$                             |
|                                           |                                       | \$                             |

If applicable, describe the property, including tax map information and address, referenced in the order:

The judgment information above has been provided by the submitting party. Disputes concerning the amounts contained in this form may be addressed by way of motion pursuant to the SC Rules of Civil Procedure. Amounts to be computed such as interest or additional taxable costs not available at the time the form and final order are submitted to the judge may be provided to the clerk. Note: Title abstractors and researchers should refer to the official court order for judgment details.

Circuit Court Judge \_\_\_\_\_ Judge Code \_\_\_\_\_ Date \_\_\_\_\_

**For Clerk of Court Office Use Only**

This judgment was entered on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ and a copy mailed first class or placed in the appropriate attorney's box on this 5 day of Jan, 2018 to attorneys of record or to parties (when appearing pro se) as follows:

William T. Geddings Jr.

William O. Sweeny III

ATTORNEY(S) FOR THE PLAINTIFF(S)

ATTORNEY(S) FOR THE DEFENDANT(S)

Court Reporter \_\_\_\_\_

Clerk of Court [Signature]

# Geddings Law Firm, PA

20 South Brooks Street  
Manning, South Carolina 29102

W. T. Geddings, Jr.\*

\* also admitted to practice in Georgia

(803) 435-4770

FAX: (803) 435-2841

E-Mail: [WTG@GeddingsLawFirm.com](mailto:WTG@GeddingsLawFirm.com)

FED ID # 57-1117536

August 14, 2019

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

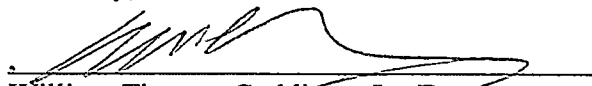
RE: Jackie Eadon Chalfant v. Carolinas Dermatology Group, PA  
Case No. 2017-CP-40-00517  
Appellate Case No.: 2019-001145

Dear Ms. Kitchings:

I received an Order purporting to dismiss the appeal in this matter for failure to order the transcript as required. The transcript was ordered in a timely manner and payment sent to the Court Reporter. Copies of that correspondence were sent to you as required. Please let me know if you did not receive the copies. I am hopeful that something just crossed in the mail.

If you wish to provide an e-mail address, I will be happy to provide you with scans of that correspondence or I will mail you additional copies if you wish.

Sincerely,



William Thomas Geddings, Jr., Esq.  
GEDDINGS LAW FIRM, P.A.  
Attorney for Appellant

cc: Martin S. Driggers, Jr., Esq.  
SWEENY, WINGATE & BARROW, P.A.  
115 Cargill Way, Suite B  
Hartsville, South Carolina 29550  
Phone: (843) 878-0390  
E-mail: [MSD@swblaw.com](mailto:MSD@swblaw.com)  
Attorney for Respondent

# The South Carolina Court of Appeals

Jackie Eadon Chalfant, Individually and as a Personal  
Representative of the Estate of Michael Dallas Chalfant,  
Appellant,

v.

Carolinas Dermatology Group, P.A., a South Carolina  
Professional Association, and Mark G. Blasiks, M.D.,  
Individually, Respondents.

Appellate Case No. 2019-001145

The Honorable R. Keith Kelly  
Richland County  
Trial Court Case No. 2017CP4000517

---

## ORDER

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Appellant has failed to order the transcript, as required by Rule 207 of the South Carolina Appellate Court Rules and the Court's letter dated July 26, 2019. Accordingly, this matter is dismissed. The remittitur will be sent as provided by Rule 221(b), SCACR.

FOR THE COURT

BY V. Claire Allen, Deputy  
CLERK

Columbia, South Carolina

cc: William T. Geddings, Jr., Esquire  
Martin S. Driggers, Jr., Esquire  
Brandon Robert Gottschall, Esquire

FILED

August 12, 2019



## The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS  
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August 19, 2019

Mr. William T. Geddings, Jr., Esquire  
20 S Brooks St  
Manning SC 29102

Re: Jackie Chalfant v. Carolinas Dermatology Group, PA  
Appellate Case No. 2019-001145

Dear Counsel:

The Court received your letter dated August 14, 2019. To answer your letter, this appeal was dismissed on August 12, 2019, for the failure to order the transcript pursuant to Rule 207, SCACR, and for failure to respond to our July 26, 2019 letter alerting you to the failure to provide proof of compliance with Rule 207. If you wish for the Court to construe your letter as a motion to reinstate you must comply with Rules 221 and 240, SCACR, which includes provision of a proof of service of your motion on opposing counsel and payment of the \$50.00 filing fee. If a corrected motion is not actually received within 15 days of the date of this letter, remittitur will be sent.

Very truly yours,

*V. Claire Allen, Deputy*

CLERK

cc: Martin S. Driggers, Jr., Esquire  
Brandon-Robert-Gottschall, Esquire

# Geddings Law Firm, PA

20 South Brooks Street  
Manning, South Carolina 29102

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FED ID # 57-1117536

August 29, 2019

**RECEIVED**

AUG 30 2019

**SC Court of Appeals**

South Carolina Office of Court Administration  
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Columbia, South Carolina 29201

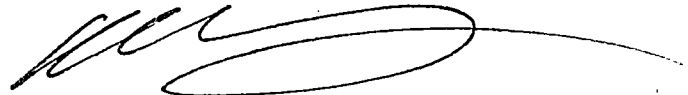
RE: Jackie Eadon Chalfant, Individually and as Personal Representative of the Estate of Michael Dallas Chalfant, Appellant, v. Carolinas Dermatology Group, P.A., a South Carolina Professional Association, and Mark G. Blaskis, M.D., Individually, Respondent, Appellate Case No. 2019-001145 / Lower Case No. 2017-CP-40-00517

Dear Sir or Madam:

Enclosed please find a true and correct copy of the Appellant's Motion to Reinstate the appeal dismissed on August 12, 2019, along with the Proof Service and payment of the \$50.00 filing fee.

Thanks in advance for your assistance in this matter.

Sincerely,



William Thomas Geddings, Jr., Esq.

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